

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
SOUTHERN DIVISION  
Case No. 7:23-cv-897

IN RE:	)	
	)	
CAMP LEJEUNE WATER LITIGATION	)	<b>JOINT PROPOSED PRETRIAL</b>
	)	<b>SCHEDULING ORDER FOR CERTAIN</b>
This Document Relates To:	)	<b>TRACK 1 TRIAL ISSUES</b>
ALL CASES	)	
	)	

The Plaintiffs’ Leadership Group (the “PLG”), together with the Defendant United States of America (“Defendant” or the “United States”) (collectively, the “Parties”), jointly file this Joint Proposed Pretrial Scheduling Order pursuant to the Order entered on June 28, 2024 (D.E. 247) .

1) Pursuant to the Order entered on July 9, 2024 (D.E. 250), discovery related to the Track 1 Trial Plaintiffs closes on August 11, 2024.

2) The PLG will disclose its experts relating to the “toxic chemical exposure from the water at Camp Lejeune” (the “Water Contamination Phase”) 75 days after the close of fact discovery.

3) The Defendant will disclose its experts relating to the Water Contamination Phase 45 days after the PLG disclose their experts relating to the Water Contamination Phase.

4) The PLG will disclose its rebuttal Water Contamination Phase experts 21 days after the Defendant discloses its experts relating to the Water Contamination Phase.

5) The PLG will disclose its experts relating to “general causation for Track 1 illnesses” (the “General Causation Phase”) 120 days after the close of fact discovery.

6) The Defendant will disclose their experts relating to General Causation 45 days after the PLG discloses its experts relating to the General Causation Phase.

7) The PLG will disclose its rebuttal experts relating to General Causation 21 days after the Defendant discloses their experts relating to General Causation Phase.

8) Following the expert disclosures relating to each phase, the parties will have 45 days to complete expert discovery relating that phase-

9) Following expert discovery relating to each phase, the parties will have 30 days to serve motions to exclude any experts (“Daubert motions”) and motions for summary judgment relating to that phase. The parties will have 21 days to file oppositions to the motions and 14 days to file replies to the-oppositions.

10) The parties will disclose expert reliance files within 7 days of the initial expert disclosure for that expert.

11) Expert witness depositions will be presumptively limited to 7 hours per expert for these phases absent agreement of the parties or court order for good cause.

12) Each party will pay for the time that the opposing party expert spends under oath in deposition, at the same rate paid by the party that retained the expert; otherwise, the parties are responsible for the fees of the experts they retain.

13) At the appropriate time following determination of motions on the Water Contamination Phase and the General Causation Phase, the parties will disclose its experts regarding specific causation and damages.

[Signatures on Following Page]

DATED this 12th day of July, 2024.

Respectfully submitted,

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